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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

STEPHEN GAINES,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 3:24-cv-09127-LJC

STIPULATION AND ~~PROPOSED~~ ORDER  
 EXTENDING DEFENDANT'S TIME TO FILE  
 RESPONSE TO PLAINTIFF'S BRIEF

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant shall have a 30-day extension of time, from May 19, 2025 to June 18, 2025, for Defendant to respond to Plaintiff's Brief in Support of Reversal of the Decision of the Commissioner and Remand (Dkt. No. 14).

This is Defendant's first request for an extension of time. Good cause exists for this Extension. Defendant is asking for more time to respond to Plaintiff's brief. Upon review of

1 Plaintiff's brief and the transcript, Defendant requires more time to consult with the client and  
 2 Plaintiff regarding settlement options in this case and to file a responsive brief absent settlement.  
 3 Therefore, Defendant requests an additional 30-day extension.

4 The Office of the General Counsel contacted Plaintiff's counsel, and there is no objection  
 5 to this motion. This request is made in good faith and with no intention to unduly delay the  
 6 proceedings, and counsel apologizes for any inconvenience. Defense counsel believes the  
 7 requested extension should allow sufficient time to address the issues.

8 Plaintiff does not oppose Defendant's request for an extension of time. The parties  
 9 further stipulate that the deadline for any reply by Plaintiff, if necessary, will be extended  
 10 accordingly.

11 Pursuant to Section 5-1(i)(3) of the Civil Local Rules of the United States District Court  
 12 for the Northern District of California, I certify that the content of this document is acceptable to  
 13 counsel for Plaintiff and that I have obtained authorization from Jacob Robert's office, to affix  
 14 their electronic signature to this document.

15 DATED May 14, 2025

16 Respectfully submitted,

17 /s/ Jacob Robert  
 18 JACOB ROBERT  
 (\*as authorized via email May 14, 2025)  
 19 Attorney for Plaintiff

20 PATRICK D. ROBBINS  
 21 United States Attorney

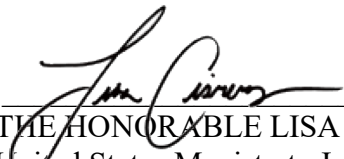
22 By: s/ Lori A. Lookliss  
 23 LORI A. LOOKLISS  
 24 Special Assistant United States Attorney  
 Office of Program Litigation, Office 7

25 Attorneys for Defendant

26  
 27 ORDER

Pursuant to stipulation, IT IS SO

ORDERED. Dated: May 15, 2025

  
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THE HONORABLE LISA J. CISNEROS  
United States Magistrate Judge